## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN OROSS, III

Plaintiff : CIVIL ACTION

:

NO. 21-5032

V.

:

KUTZTOWN UNIVERSITY, et al.

Defendants

## PLAINTIFF'S MOTION FOR ATTORNEYS FEES AND COSTS

Pursuant to Section 794a of the Rehabilitation Act of 1973, as amended and 42 U.S.C. §1988, Plaintiff Stephen Oross, III, through his undersigned counsel, respectfully moves the Court for an award of attorneys fees and costs in connection with the above-captioned lawsuit. For all the reasons set forth in the Motion and the Memorandum of Law and the corresponding Appendix, Plaintiff is the prevailing party, and is entitled to reimbursement of all reasonable costs and attorneys fees he and his counsel have incurred in the successful prosecution of his case. He is seeking \$896,742.00 in attorneys fees and \$6759.12 for reimbursement of litigation costs.

Respectfully submitted,

By:

LORRIE McKINLEY McKINLEY & RYAN, LLC

238 West Miner Street West Chester, PA 19382

(610) 436-6060

**RALPH E. LAMAR**201 N. 3<sup>rd</sup> Street, No. 323
4728 Hamilton Blvd.
Allentown, PA 18103
(610) 563-0726

Attorneys for the Plaintiff

DATE: February 3, 2025

## CERTIFICATE OF SERVICE

I hereby certify that on this date, February 4, 2025, a true and correct copy of the foregoing Plaintiff's Motion for Attorneys Fees and Costs and the corresponding Memorandum of Law and Appendix was served upon counsel by way of the Court's ECF system as follows:

Kevin Bradford, Esquire Senior Deputy Attorney General

Matthew Skolnik, Esquire Senior Deputy Attorney General

Pennsylvania Office of Attorney General Eastern Regional Office, Civil Litigation Section 1600 Arch Street, Suite 300 Philadelphia, PA 19103

LORRIE McKINLEY, ESQUIRE